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Office of the Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

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FCC Mail Room

CG Docket 06-181
2004
Re: Case Identifier: CGB-CC-004
Petition for Closed Captioning Exemption
Request for Supplemental Information

To: Cheryl J. King, Attorney
Disability Rights Office
Consumer and Governmental Affairs Bureau

Dear Ms King,

In response to your letter of September 27, requesting additional information to advance our request for an exemption to captioning requirement, we now inform you of our intent to withdraw our petition for exemption.

Since we submitted our request for exemption, our Board of Directors decided to further investigate how we could become compliant with your regulation. We already knew it would not be feasible to outsource the insertion of captioning due to a minimum cost of approximately \$350.00 per weekly episode. We were able to find an editing system which would allow captioning to survive the editing process. We were also able to find hardware to insert captioning at the "raw" unedited stage. The final link was a software package that would feed the text into the equipment. Even though the cost of the improvements would be substantial, it would still be far less than the cost of outsourcing, and once the improvements were installed there would be little ongoing expenses.

Our next problem was money. After much Prayer we were very blessed to have one of our supporters step up and volunteer to pay for the improvements. We recently received the necessary improvements and they have now been installed in our system.

We are now moving into the final phase toward captioning which is training and incorporation. Our program utilizes a different cast every week. We need to make everyone aware that they will need to write out the entire script in rich text format, and then follow it precisely during their presentation.

Our goal was to have this all accomplished by January 1, 2014, however at this time that timetable looks unrealistic. Your letter stated that if we did not submit the necessary documentation, we would be compelled to begin captioning within 90 days of the dismissal of the petition. That may also be too ambitious. In our initial application on January of 2012 we asked for a two year extension. If you were to consider dating the notification as of February 1, 90 days from that date would give us until May 1 to become compliant. This I feel is possible.

If this timetable is acceptable to you I am confident we will be able to meet your requirements.

I await your reply.



A.G. Te Slaa
Board Chairman
Main Street Living